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Douglas Hallward-Driemeier
(*pro hac vice* admission pending)

Attorneys for MOAC Mall Holdings LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
In re	:	Chapter 11
	:	
SEARS HOLDING CORPORATION, <i>et al.</i> , ¹	:	Case No. 18-23538 (RDD)
	:	
Debtors.	:	(Jointly Administered)
-----	X	

MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Douglas Hallward-Driemeier, request admission *pro hac vice*, before the Honorable Robert D. Drain, to represent MOAC Mall Holdings LLC in the above-captioned chapter 11 cases.

I certify that I am a member in good standing of the Supreme Judicial Court of the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Commonwealth of Massachusetts and the bar of the District of Columbia.

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

This Motion shall not constitute a submission by MOAC to the jurisdiction of the Bankruptcy Court. MOAC specifically appears only for purposes of objecting to *Motion to Enforce the Order (I) Authorizing Assumption and Assignment of Lease with MOAC Mall Holdings LLC and (II) Granting Related Relief* [Docket No. 10194], expressly reserving, and without waiving, all rights and objections with respect to personal jurisdiction and subject matter jurisdiction.

Dated: February 22, 2022
Washington, DC

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
SEARS HOLDING CORPORATION, <i>et al.</i> , ¹	:	Case No. 18-23538 (RDD)
	:	
Debtors.	:	(Jointly Administered)
-----	X	

ORDER GRANTING ADMISSION TO PRACTICE, *PRO HAC VICE*

Upon the motion of Douglas Hallward-Driemeier (the “Movant”), to be admitted, *pro hac vice*, to represent MOAC Mall Holdings LLC in the above-captioned chapter 11 cases, and upon the Movant’s certification that the Movant is a member in good standing of the Supreme Judicial Court of the Commonwealth of Massachusetts and the bar of the District of Columbia, it is hereby

ORDERED, that Douglas Hallward-Driemeier, is admitted to practice, *pro hac vice*, in the above-referenced case to represent MOAC Mall Holdings LLC in the United States Bankruptcy Court for the Southern District of New York, provided that the filing fee has been paid.

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Dated: February __, 2022
New York, New York

HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE